



"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

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July 17, 2025

VIA ECF

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, New Jersey 07101

**Re: *In re: Insulin Pricing Litigation*, Case No. 2:23-md-03080 (MDL No. 3080)
Letter Regarding Puerto Rico's Motion for Leave to Amend**

Dear Judge Wettre,

In addition to the discovery-related motions that the State Attorneys General Track summarized in its July 16, 2025 letter to the Court, ECF No. 662, the Government of Puerto Rico ("Puerto Rico") has a pending Motion for Leave to Amend that is a priority.

Puerto Rico filed its Motion for Leave to Amend Complaint on June 6, 2025 and requested oral argument. ECF No. 605. It seeks to add allegations concerning non-insulin products and non-diabetes products and add the PBM Defendants' group purchasing organizations as defendants. Puerto Rico moved for leave to amend its complaint promptly after the decision of the First Circuit Court of Appeals on its remand motion, and prior to the JPML transferring this action to this MDL, but the request was denied as untimely in the context of the conditional transfer order. Consistent with controlling authority, the Court should allow Puerto Rico leave to amend its complaint because, prior to this matter being transferred, discovery had not yet begun, and no court had set a scheduling order (including a deadline for amendment of pleadings) or ruled on any substantive motions.

Thank you for your consideration. Puerto Rico is prepared to address its Motion for Leave to Amend Complaint at the next hearing if oral argument would assist the Court.

Sincerely,

/s/ Elizabeth Paige Boggs

Elizabeth Paige Boggs

Counsel for Plaintiff Government of Puerto Rico